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November 20, 2023

**VIA ECF**

Hon. Leda Dunn Wettre, U.S.M.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Courtroom 3C  
Newark, NJ 07102

**Re: CFTC v. WorldWideMarkets, Ltd., et al.; Civil Action No. 21-20715**

Dear Judge Wettre:

This office, along with Gekas Law, Ltd., represents Defendant Arthur Dembro in the above-referenced matter. We write in furtherance of our November 6, 2023 letter. ECF No. 107).

As the Court may recall, part of the Court's reasoning in denying, without prejudice, Defendant Dembro's request for the entry of a Qualified HIPAA Protective Order was the potential for Defendant Dembro to obtain information regarding Defendant Thomas Plaut's health during a deposition. Shortly after the September 26, 2023 status conference before Your Honor, Plaintiff served three depositions for November 3 (Defendant WorldWideMarkets), November 14 (Defendant TAB Networks), and November 16 (Defendant Plaut).

Defendant Plaut failed to appear for his own deposition on November 16, 2023. Moreover, Defendant Plaut did not appear for the corporate-entity Defendants' depositions, nor did he send a representative. Copies of the "no-show" deposition transcripts are annexed hereto as Exhibits 1, 2, and 3.

In light of the foregoing, along with the reasons set forth in our November 6, 2023 letter (ECF No. 107), Defendant Dembro respectfully requests that the Court enter the Proposed Qualified HIPAA Protective Order so that he may obtain the appropriate discovery in this case.

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We are available to answer any questions you may have and thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Guillermo C. Artiles  
Guillermo C. Artiles

cc: All Counsel of Record (via ECF)  
Defendant Thomas Plaut (via ECF and USPS Priority Mail)